

## REMARKS

### Amendments to the Drawings

Figure 1 has been amended to more clearly reflect that the fuel distributor valve 48 provides flow between either the liquid fuel system 28 or the gas fuel system 18 and the fuel nozzles 52. Support for the amendment may be found throughout the specification, including paragraphs [0010] and [0014]. No new matter has been introduced by this change.

### Amendments to the Specification

The Specification was amended to correct obvious typographical errors and omissions relating to the numbering of the drain valve and air vent in paragraph [0012] and the liquid fuel supply line in paragraph [0018]. No new matter has been introduced by these changes.

### Amendments to the Claims

Claim 1 was amended to include the limitations of dependent claim 3 to further require sealing the nitrogen gas in the liquid fuel supply system while the combustion turbine combusts gaseous fuel. Accordingly, claim 3 was cancelled. Claims 1, 2, and 4-20 are pending upon entry of the foregoing amendments. Reconsideration of the present application, as amended, and allowance of the pending claims is respectfully requested in view of the following remarks.

### Rejection Under 35 U.S.C. § 112

The Examiner rejected claims 1-20 under 35 U.S.C. § 112, first paragraph, as being drawn to an invention that is not described in such full, clear, concise and exact

terms as to enable any person skilled in the art to make and use the same. Applicants respectfully traverse the rejection.

Applicants respectfully disagree with the Examiner's assessment of the disclosure as being inadequate with respect to gas fuel operation. Applicants have amended Figure 1 to more clearly reflect that the fuel distributor valve 48 is not intended to be limited to "a two position valve that merely opens or closes the flow path defined by lines 28 and 50 between the liquid fuel system and the nozzles." Office Action at Page 2, ¶ 2. On the contrary, Applicants expressly teach that "the gaseous fuel supply system 18 feeds the gaseous hydrocarbon fuel to the nozzles 52," while a liquid fuel supply system 20 supplies an alternative liquid hydrocarbon fuel to the combustion chamber when the gaseous hydrocarbon fuel is undesirable or unavailable. See e.g., ¶¶ [0011] and [0014]. Accordingly, Applicants submit that the rejection should be withdrawn in light of the disclosure and the amendment to the drawings.

The Examiner also rejected claim 1 as being drawn to a method claim with only a single step. Applicants respectfully traverse the rejection as being moot in light of the foregoing claim amendments.

#### **Rejection Under 35 U.S.C. § 102**

The Examiner rejected claims 1, 2, and 8 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,256,975 to Dobbeling et al. (hereinafter "Dobbeling"). The rejection is respectfully traversed.

The Examiner has failed to establish a *prima facie* case of anticipation because the cited prior art reference does not disclose each and every element of the Applicant's claimed invention. Specifically, Dobbeling does not disclose a method for injecting

nitrogen gas into a liquid fuel supply system and sealing the nitrogen gas in the liquid fuel supply system while the combustion turbine combusts gaseous fuel. On the contrary, Dobbeling discloses only that an auxiliary medium may be used to *flush* liquid fuel from liquid fuel feed lines very near the combustion burner. See e.g., Col. 2, Lines 3-8; Col. 3, Line 65. Dobbeling makes no teaching or suggestion that it may be desirable to *seal* the nitrogen gas in the liquid fuel supply system.

Moreover, Dobbeling does not teach that the combustion turbine continues to combust gaseous fuel when the nitrogen gas is sealed in the liquid fuel supply system. Instead, Dobbeling expressly limits its application to operations in which the gas turbine has been completely shut down. See e.g., Fig. 2. Accordingly, the rejection is unsupported by the prior art and must be withdrawn.

#### **Rejection Under 35 U.S.C. § 103**

The Examiner also rejected claims 1, 2, and 8 under 35 U.S.C. § 103(a) as being unpatentable over Dobbeling. The rejection is respectfully traversed.

The Examiner has failed to establish a *prima facie* case of obviousness because the cited prior art reference does not disclose each and every element of the Applicant's claimed invention. Specifically, Dobbeling makes no teaching or suggestion the desirability of combining a gas turbine having both liquid and gas fuel feeds. Moreover, Dobbeling does not remotely teach or suggest a method for injecting nitrogen gas into a liquid fuel supply system and *sealing* the nitrogen gas in the liquid fuel supply system *while the combustion turbine combusts gaseous fuel*.

On the contrary, Dobbeling is expressly limited to "removing liquid fuel from the fuel system of a gas turbine after shutting down the turbine." Col. 1, Lines 10-11

(emphasis added). For example, Dobbeling teaches that “the main amount of the liquid fuel is emptied into the combustion chamber and has to be rendered harmless with regard to the risk of an explosion.” Col. 2, Lines 46-64. Dobbeling also teaches that “the burner lances are completely cleaned with the high-pressure flushing operation.” Col. 2, Lines 49-50. These disclosures clearly indicate that an essential feature of Dobbeling’s invention is that the gas turbine engine be shut down at the time of the flushing operation of the liquid fuel line. Accordingly, one of ordinary skill in the art would have no reason or motivation to modify Dobbeling’s teachings to encompass a gas turbine in which the liquid fuel lines are *sealed* with nitrogen while the gas turbine combusts gaseous fuel because doing so would be inconsistent with Dobbeling’s own teachings. Thus, the rejection is unsupported by the prior art and must be withdrawn.

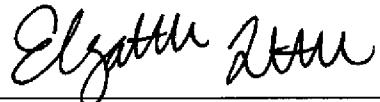
#### **CONCLUSION**

For the foregoing reasons, Applicants submit that claims 1, 2 and 4-20 are both novel and patentable over the cited prior art. Allowance of the pending amended claims is earnestly solicited.

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RESPONSE TO OFFICE ACTION  
DATED APRIL 18, 2007

If there are any issues which can be resolved by a telephone interview or with an examiner's amendment, the Examiner is invited to telephone the undersigned at 404.853.8012.

Respectfully submitted,



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